

**UNITED STATES BANKRUPTCY COURT FOR THE
SOUTHERN DISTRICT OF ILLINOIS**

IN RE:) IN PROCEEDINGS UNDER
SARAH J. CHILDERS,) CHAPTER 7
Debtors.) Case No. 10-41341
)
)

**MOTION TO DIRECT DEBTOR TO TURNOVER PROPERTY TO TRUSTEE
AND COMPEL PRODUCTION OF DOCUMENTS**

Count I – Turnover

COMES NOW, Dana S. Frazier, Trustee in the above-captioned case, and for her Motion to Direct Debtor to Turnover Property to Trustee, states as follows:

1. Dana S. Frazier, is the duly and acting Trustee in this case.
2. The Trustee requested the turnover of the nonexempt equity in:
 - A. 2009 income tax refund in the amount of \$856.00.
 - B. 2006 Lincoln vehicle in the amount of \$2,150.00.
3. To date, the Debtor has neither paid the nonexempt equity requested nor surrendered the vehicle for sale by the Trustee.

WHEREFORE, the Trustee prays that this Court enter its order directing the Debtor to turnover to the Trustee within 10 days the total amount of \$3,006.00 and order a judgment to be entered against the Debtor in the amount of \$3,006.00 if she fails to pay said sum when due.

Count II – Compel Production of Documents

COMES NOW, Dana S. Frazier, Trustee in the above-captioned case, and for her Motion to Compel Debtor to Provide Trustee with Documents states as follows:

1. Dana S. Frazier, is the duly and acting trustee in this case.

2. In order for the Trustee to perform the duties required of her by law, it is necessary for her to review the following:

A. Copies of bank statements for Old National Bank checking account for July 20, 2010 through August 30, 2010.

B. Copies of the check register for SIU Credit Union account.

C. Copies of a current statement as to the Knights of Columbus whole life insurance policy identifying the type of policy, owner, insured, cash value and designated beneficiary.

D. Copies of a current statement as to the Monumental Life insurance policy identifying the type of policy, owner, insured, cash value and designated beneficiary.

E. Copies of her filed 2010 income tax returns.

F. Copies of the deed and other transfer documents to evidence the transfer of certain real estate to Michael Childers on 12/28/2007.

3. The Trustee has requested in writing that the Debtor furnish her with such information and documentation but the Debtor has failed to do so.

WHEREFORE, the Trustee prays that this Court enter its order directing the Debtor to deliver to the Trustee within 10 days copies of all documents mentioned herein.

Respectfully Submitted

./s/ Dana S. Frazier

Dana S. Frazier, 06242921

Chapter 7 Trustee

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I served a copy of the **Motion to Turnover and Compel Production of Documents** by U.S. Mail or Electronic Mail to:

Dan Cavaness (electronic)

Sara J. Childers
11031 Limb Branch Lane
Marion, IL 62959

U.S. Trustee, Region 10
Becker Building
401 Main, Room 1100
Peoria, IL 61602

Dated: October 12, 2011

/s/ Dana S. Frazier
Dana S. Frazier, #06242921
Trustee

Frazier Law Office, LLC
P.O. Box 159
Murphysboro, IL 62966
Tel: (618) 687-5707
Fax: (618) 687-5710